

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Honorable Thomas Vanaskie  
(Ret.),  
Special Discovery Master

**NOTICE OF MOTION TO  
SEAL PURSUANT TO L.  
CIV.R. 5.3(c)**

TO: Adam M. Slater, Esq.  
Plaintiffs' Liaison Counsel  
Mazie Slater Katz & Freeman, LLC  
103 Eisenhower Parkway  
Roseland, NJ 07068

**PLEASE TAKE NOTICE** that on November 1, 2021, or as soon thereafter as counsel may be heard, Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. ("ZHP"), Princeton Pharmaceutical Inc. ("Princeton"), Huahai U.S. Inc. ("Huahai U.S."), and Solco Healthcare US, LLC ("Solco", and collectively with ZHP, Princeton, and Huahai U.S., "the ZHP Parties"), by and through their counsel in the above-captioned action, Duane Morris LLP, shall move before the Honorable Thomas Vanaskie (Ret.), Special Discovery Master, for entry of an Order sealing Exhibits 4-10 and 14-16 to Plaintiffs' Motion to Compel (Dkt. No. [1405](#)) pursuant to Local Civil Rule 5.3(c).

**PLEASE TAKE FURTHER NOTICE** that in support of their Motion, the ZHP Parties shall rely on the accompanying Declaration of Kelly Bonner, dated October 12, 2021, the Declaration of Mi Xu, dated October 12, 2021, attached as **Exhibit A** thereto, the Declaration of Dr. Min Li, dated October 12, 2021, attached as **Exhibit B** thereto, and an index identifying the documents the ZHP Parties seek to seal, attached as **Exhibit C** thereto.

**PLEASE TAKE FURTHER NOTICE** that, for the Court's convenience, a proposed form of Order, including Proposed Findings of Fact and Conclusions of Law pursuant to Local Civil Rule 5.3(c)(6), is also submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that the undersigned attorneys for the ZHP Parties request oral argument on this motion.

**PLEASE TAKE FURTHER NOTICE** that a Certificate of Service attesting to the date and manner of service is submitted herewith.

Dated: October 12, 2021

Respectfully submitted,

/s/ Seth A. Goldberg  
Seth A. Goldberg, Esq.  
*Lead Counsel and Liaison*  
*Counsel for Defendants*

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Pharmaceutical Inc., Huahai U.S.  
Inc., and Solco Healthcare U.S.,  
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